



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 22, 2024

By ECF

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Consortium for Independent Journalism, Inc. v. NewsGuard Technologies, Inc., et al.*, No. 23 Civ. 7088 (KPF)

Dear Judge Failla:

This Office represents the United States of America (the “Government”), in the above-referenced action, brought by Plaintiff Consortium for Independent Journalism, Inc. (“Plaintiff”) against the Government and Defendant NewsGuard Technologies, Inc. (together with the Government, “Defendants”). Defendants write jointly to inform the Court that they have reviewed Plaintiff’s Second Amended Complaint and still wish to move to dismiss. We also write on behalf of all parties to propose the following joint briefing schedule for Defendants’ anticipated motions to dismiss:

- Defendants’ motions to dismiss shall be due by June 11, 2024;
- Plaintiff’s opposition(s) shall be due by August 12, 2024; and
- Defendants’ replies shall be due by September 11, 2024.

We thank the Court for its consideration of this matter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/ Alyssa B. O’Gallagher
DANA WALSH KUMAR
ALYSSA B. O’GALLAGHER
Assistant United States Attorneys
Tel: (212) 637-2741/2822
Dana.Walsh.Kumar@usdoj.gov
Alyssa.O’Gallagher@usdoj.gov